



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

February 26, 2019

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Draft Physical Water Column Monitoring Sampling Program Characterization Summary

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed *Draft Physical Water Column Monitoring Sampling Program Characterization Summary*, dated March 2014. The report was prepared by AECOM on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area.

In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's draft summary report with this letter. Please proceed with the revisions to the summary report within 30 days consistent with the enclosed comment evaluations. If there are any questions or clarifications needed, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie", is positioned above the typed name.

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

**DRAFT PHYSICAL WATER COLUMN MONITORING SAMPLING PROGRAM CHARACTERIZATION SUMMARY FOR THE LOWER PASSAIC
RIVER STUDY AREA DATED MARCH 2014**

<u>No.</u>	<u>Page No.</u>	<u>Specific Comments</u>
1	Page ES-2, First bullet, Second to last sentence	Please note the typographical error and delete the extra period and space.
2	Page 1-4, Section 1.1.2, Second paragraph, First sentence	The figure number, 1-2 is incorrect. Please revise the number to read 1-1.
3	Page 2-5, Section 2.2.5.1, Second sentence	Please delete “WW” from Figure 2-1.
4	Page 2-6, Top of page, Second bullet	There was only one monitoring location above Dundee Dam and that was at RM 17.4 as per the QAPP, prior text in the summary document, and Figure 2-1. Please revise as appropriate.
5	Page 2-6, Section 2.2.6, Third sentence	Please note the typographical error and change 585 to read 586.
6	Page 2-8, Section 2.4.2.2, Third sentence	The tables referenced are numbered incorrectly in the text. Please revise the table numbers to 2-5 and 2-6.
7	Page 2-8, Section 2.5, Second paragraph, First sentence	The table referenced is numbered incorrectly in the text. Please revise the table number to 2-7.
8	Section 4	On page 2-10, bullet number 6 indicates that based on analyses performed by Moffat and Nichol, 18 suspended sediment concentrations (SSC) were excluded from the regression of optical and acoustic backscattering versus SSC (these “excluded” data are identified in Table 2-8). The “excluded” data, however, are not mentioned In Section 4. (Data Usability). More significantly, Moffat and Nichol also identified long-term monitoring data (e.g. optical backscattering data at Dundee Dam) that they excluded from use because their analysis concluded that the instruments were fouled for specific periods of time. These additional excluded data should also be documented and mentioned in section 4.
9	Table 3-1	<ul style="list-style-type: none"> a. In order to differentiate between events other than by the dates presented, it would be helpful if additional rows were inserted into the table to identify each sampling event. For example, Long term monitoring event 1, wet weather event 1 etc. b. Please clarify in the footnotes what the 1.2 micron represents in the column title for SSC. It is assumed that it refers to particle size. If so, it gives the impression that the SSC results are only limited to particles that are 1.2 microns in size as opposed to > or < 1.2. c. Sample ID’s for location 10B-T054-P1 are listed as both “Bridge” and “Bridge St.”. These should be consistent.